

GREG W. MARSH, ESQ.
Nevada Bar No. 322
LAW OFFICES OF GREG W. MARSH
731 South Seventh Street
Las Vegas, Nevada 89101
Tel: (702) 387-0052
Fax: (702) 387-0063
gwm4253@aol.com

PAUL G. CEREGHINI, ESQ.
Nevada Bar No. 10000
CURTIS J. BUSBY, ESQ.
Nevada Bar No. 6581
BOWMAN AND BROOKE LLP
2901 North Central Avenue, Suite 1600
Phoenix, Arizona 85012
Tel: (602) 643-2300
Fax: (602) 248-0947
paul.cereghini@bowmanandbrooke.com
curtis.busby@bowmanandbrooke.com

Attorneys for Defendant/Crossdefendant Chrysler Group LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAMION L. THOMAS,
Plaintiff,

vs.

CHRYSLER GROUP, LLC; CAROL M.
DOUGLASS; DOES I through X; and ROE
CORPORATIONS XI THROUGH XX, inclusive,
Defendants.

CAROL M. DOUGLASS,
Crossclaimant,

vs.

CHRYSLER GROUP, LLC.
Crossdefendant.

CASE NO. 2:14-cv-671-JAD-GWF
**PROTECTIVE ORDER GOVERNING
CONFIDENTIALITY OF
DOCUMENTS**

1 Defendant Chrysler Group LLC ("Chrysler Group"), by and through its attorneys of
2 record, Curtis J. Busby, of Bowman and Brooke LLP, and Greg W. Marsh, of the Law
3 Offices of Greg W. Marsh; Plaintiff Damion Thomas, by and through his attorney of record,
4 George T. Bochanis, of George T. Bochanis, Ltd.; and Defendant/Crossclaimant Carol M.
5 Douglass, by and through her attorney of record George M. Ranalli and Steven M.
6 Goldstein, of Ranalli & Zaniel, hereby stipulate and agree as follows:

7 WHEREAS the Parties already have or anticipate that they will produce documents
8 or provide information in the above-captioned matter that may contain personal,
9 confidential, proprietary, trade secret, or competitively sensitive information ("Confidential
10 Information");

11 WHEREAS the Parties hereby enter into the terms of this Protective Order Governing
12 Confidentiality Of Documents pursuant to Fed. R. Civ. P. 26(c) limiting the dissemination of
13 Confidential Information that may be produced or otherwise disclosed in the above captioned
14 matter.

15 Based on the foregoing,

16 IT IS HEREBY STIPULATED AND AGREED as follows:

17 1. Whether by automatic disclosure or in response to written discovery, the
18 parties may designate as "protected" or "subject to protective order" or with a similar
19 designation any portion of its documents produced or discovery responses that contain
20 Confidential Information, including personal, trade secret or other confidential research,
21 development or commercial information or which is otherwise considered protected under
22 applicable law. Testimony and other information based upon documents so designated
23 shall be considered protected and subject to this Protective Order.

24 2. Information contained therein shall be disclosed only to counsel of record in
25 this action or only to individuals certified by such counsel as employed by or assisting
26 counsel in preparation for, or at the trial of, this action. Any person or firm to whom
27 Confidential Information is to be disclosed shall first be advised by counsel making
28

1 disclosure that, pursuant to this Protective Order, such person or firm may not divulge any
2 such information to any other person.

3 3. Any such documents or information shall be used only for the purpose of
4 prosecuting this action.

5 4. In the event that any party seeks to attach Confidential Information to any
6 pleading, motion, deposition transcript or other paper filed with Clerk of the Court, the party
7 filing the pleading, motion, deposition transcript or other paper must comply with the Ninth
8 Circuit's directives in *Kamakana v. City and County of Honolulu*, 447 F.3d 1172 (9th Cir.
9 2006), and the following:

10 a. The Confidential Information to be submitted with the pleading, motion,
11 deposition transcript, or other paper must be submitted only for *in camera* inspection
12 in accordance with L.R. 10-5(a); or

13 b. The Confidential Information to be submitted with the pleading, motion,
14 deposition transcript, or other paper must be submitted under seal using the court's
15 electronic filing procedures as stated in L.R. 10-5(b).

16 5. The production of such documents or information by any party shall not
17 constitute a waiver of any privilege or other claim or right of withholding or confidentiality that
18 it may have.

19 6. Should any party dispute the need for any particular document(s) or information
20 to be entitled to protection pursuant to the Order, then within thirty (30) days following receipt
21 of said document(s) the party disputing confidentiality shall notify the other parties, through
22 their attorneys, of such dispute, following which the party producing the document or
23 information shall have thirty (30) days to file a motion before the Court requesting a protective
24 order. Information or documents that are disputed pursuant to this paragraph will remain
25 protected pending the Court's review and decision regarding this matter.

26 7. Upon the termination of this action, copies of all documents and information
27 furnished by Chrysler Group to Plaintiff or any other party to this action, together with all
28 originals and copies of notes, sketches, data, compilations, extracts and reproductions

furnished by Chrysler Group, shall be returned to counsel for Chrysler Group, together with a letter from any counsel receiving documents pursuant to this Order stating that all documents and copies of such documents that were provided by Chrysler Group have been returned to Chrysler Group.

IT IS SO ORDERED:


 GEORGE FOLEY JR.

UNITED STATES MAGISTRATE JUDGE

DATED: September 24, 2014

DATED this 23rd day of September, 2014.

GEORGE T. BOCHANIS, LTD.

By: /s/ George T. Bochanis (w/permission)

GEORGE T. BOCHANIS, ESQ.

Nevada Bar No. 2262

631 South Ninth Street

Las Vegas, NV 89101

Attorneys for Plaintiff

DATED this 23rd day of September, 2014.

BOWMAN AND BROOKE LLP

By: /s/ Curtis J. Busby

CURTIS J. BUSBY, ESQ.

Nevada Bar No. 6581

2901 North Central Avenue,

Suite 1600

Phoenix, Arizona 85012

In conjunction with:

GREG W. MARSH, ESQ.

Nevada Bar No. 322

LAW OFFICES OF GREG W. MARSH

731 South Seventh Street

Las Vegas, Nevada 89101

Attorneys for

Defendant/Crossdefendant

Chrysler Group LLC

DATED this 23rd day of September, 2014.

RANALLI & ZANIEL

By: /s/ George M. Ranalli (w/persmission)

GEORGE M. RANALLI, ESQ.

Nevada Bar No. 5748

Steven M. Goldstein

Nevada Bar No. 6318

2400 W. Horizon Ridge Parkway

Henderson, NV 89052

Attorneys for Defendant Carol M. Douglas